

ATTACHMENT A

The following paragraphs describe the types of records and the subjects covered by this notice:

Documents and Things Defined. Documents and things shall include the original, all non-identical copies, and all drafts of all recorded communications or information of any kind anywhere in the world, whether on paper, videotape, audiotape, disk, in computer medium, by electronic mail, and/or any other storage medium, including but not limited to writings, drawings, graphs, charts, photographs, motion picture films, phonograph records, tape and video recordings, computer data, records, correspondence, memoranda, reports, studies, minutes, pamphlets, notes, letters, telegrams, messages (including reports, notes and memoranda of telephone conversations and conferences), calendar and diary entries, records, data compilations, petitions, patents, advertisements and other data compilations from which information can be obtained and translated, if necessary, into reasonably usable form. All attachments and/or enclosures to a document will be deemed to be part of such document.

Scope. This request includes all documents and things containing information that may be relevant to, or may lead to the discovery of information relevant to, the following:

- Manufacturing methodology, testing, and/or composition and properties of tobacco, tobacco products, paper, or filters; or any other materials contained in, relating to, or used in the manufacturing, testing, and/or composition and properties of tobacco and tobacco products.
- Marketing plans and strategies relating to cigarettes including advertising and promotion.
- Sales figures for cigarettes manufactured and sold in (a) the United States and (b) the State of Iowa for the tobacco industry or any tobacco company including but not limited to Philip Morris Incorporated.
- Profit margins for cigarettes manufactured and sold in (a) the United States and (b) the State of Iowa for any brands of cigarettes or any tobacco company including but not limited to Philip Morris Incorporated.

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- Market share information for cigarettes manufactured and sold in (a) the United States and (b) the State of Iowa for any brands of cigarettes or any tobacco company including but not limited to Philip Morris Incorporated.
- Actual or proposed agreements, or any meetings, discussions, or communications between Philip Morris and other tobacco companies concerning the pricing of cigarettes (including rebates and discounts).
- Premium cigarette pricing and discount cigarette pricing.
- Cigarette sales taxes and other economic benefits to society provided by tobacco, cigarettes or the tobacco industry.

Additional Instructions.

- You must preserve all records described above that were written or generated after January 1, 1920.
- If any records falling within the definition above are sent outside of the United States, you must maintain either the original or a true copy within the United States.

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